

COPY

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STEPHANIE LYNN FORD,

Plaintiff,

V.

CHRISTIANA CARE HEALTH  
SYSTEMS, RICHARD BURTON, and  
CLARA CLARK,

Defendants,

CIVIL ACTION NO. 06-301 (\*\*\*)

JURY TRIAL

FILED  
MAR 9 2007  
U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

PLAINTIFF'S RESPONSE TO DEFENDANTS' SUMMARY JUDGMENT WITH ATTACHED  
MEDICAL RECORDS.

PLAINTIFFS' ANSWER TO DEFENDANT'S SUMMARY JUDGMENT.

I the Plaintiff, STEPHANIE LYNN FORD AM RESPONDING TO THE DEFENDANT'S  
SUMMARY JUDGMENT, I HAVE ATTACHED ALL THE NECESSARY MEDICAL RECORDS.

STEPHANIE LYNN FORD

*Stephanie L. Ford* 3/9/07  
19 ALBANY AVE.

NEWCASTLE, DELAWARE 19720

①

49 TOTAL  
PAGES

PLAINTIFF'S SUMMARY JUDGMENT QUESTIONS TO MR. DAVID WILLIAMS, PLEASE  
RESPOND TO THESE QUESTIONS AS SOON AS POSSIBLE.

1. Why are you intentionally withholding the documents, I have requested from you on numerous occasions.
2. Mr. David Williams, How are you able to use the deposition in your summary judgment dated February 13, 2007 , that I have given to Mrs. Kendra L. Baisinger, Esq. On December 13, 2006 , without me even reviewing the deposition or signing the deposition. Because, there are numerous answers to the questions, Mrs. Baisinger asked me that I responded to , that are not mention in the deposition that you forward me, so I consider this deposition dated February 13, 2007 pages A-24 To A-37 inaccurate and illegal. I am forwarding you a copy and a copy for the courts records from WILCOX & FETZER LTD'S paperwork that I have received from Kristina Flynn dated 12-20-06. The transcriber specifically inform me that they would be contacting me within 30 days, to come back in there office and review and sign the deposition. Instead, I received the letter from Kristina Flynn along with the ERRATA SHEET.
3. How, am I able to make any changes or corrections to the deposition that I have not seen.
- 4 Mr. David Williams , please address these issues.

Stephanie L. Ford

Civil Action No. 06-301 (\*\*\*)

JURY TRIAL

3-9-07

(2)



**WILCOX & FETZER LTD.**

Registered Professional Reporters

MAILED/DELIVERED: 12-20-06

FROM: WILCOX & FETZER, LTD.  
Professional Court Reporters  
1330 King Street  
Wilmington, DE 19801  
(302) 655-0477/Fax (302) 655-0497

CASE CAPTION: Ford V Christiana Care Health  
DEPOSITION TRANSCRIPT OF: Stephanie Lynn Ford

Enclosed is your copy of the deposition identified above, taken on December 13, 2006. Changes or corrections and the reasons therefor must be noted on the attached Errata Sheet, not on the transcript itself. Rule 30 (e) governing this procedure is noted below. As the rule provides, the deposition may be filed as transcribed if it has not been signed within thirty days.

Please return the completed Errata Sheet, signed by the deponent, to our office for insertion into the original and for filing with the court, if required. We will send a photocopy of the signed Errata Sheet to all counsel.

Sincerely,

A handwritten signature in cursive script that reads 'Kristina Flynn'. The signature is fluid and includes a large, sweeping flourish at the end.

Kristina Flynn  
Production Manager

**RULE 30 (e)**

If requested by the deponent or party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicated in the certificate prescribed by subdivision (f)(1) whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed.

ATTACH TO DEPOSITION OF: Stephanie Lynn Ford

DATE TAKEN: December 13, 2006

IN THE MATTER OF: Ford V Christiana Care Health

**ERRATA SHEET**

**INSTRUCTIONS:** After reading the transcript of your deposition, please note any change or correction and the reason therefor on this sheet. **Do not make any marks or notations on the transcript itself.** Rule 30(e) governing this procedure is enclosed. Please sign and date this errata sheet and return it to our office at the address indicated below. Thank you.

PAGE	LINE	CHANGE OR CORRECTION AND REASON

I have read the foregoing transcript of my deposition and, except for any corrections or changes noted above, I hereby subscribe to the transcript as an accurate record of the statements made by me.

DATED: \_\_\_\_\_  
(Signature of Deponent)

RETURN TO: WILCOX AND FETZER, LTD.  
1330 King Street  
Wilmington, DE 19801

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## I. STATEMENT OF THE NATURE AND STAGE OF PROCEEDINGS

This case against the Defendants Christiana Care Health Systems, Richard Burton, and Clara Clark Involves a claims for violation of Civil Rights Act Of 1991 Title I , violation of Title V of The Americans with Disabilities Act (ADA) , Title VII of The Civil Rights Act of 1994 , Race Discrimination , Employment Discrimination , violation of The Family Medical Leave Act of 1993 , (FMLA) , violation of The ERISA Act , 29 U.S.C. 1132 , wrongful termination of Plaintiff's Pension Benefits, wrongful termination of Plaintiff's Medical Retiree Pension Benefits, wrongful termination of Plaintiff's \$75,000 Life Insurance Policy , wrongful termination of Plaintiff's Health Insurance Benefits.

## II. SUMMARY OF ARGUMENT

The court should grant plaintiff's motion for summary judgment because the claims being raised against Christiana Care Health Systems, Richard Burton, and Clara Clark is actionable. I the plaintiff, Stephanie Lynn Ford had been working at Christiana Care Health Systems the pass 17 years from August 24, 1987 to October 28, 2003, I was involved in a Hit& Run automobile accident on October 28, 2003, my injuries are CERVICAL THORACIC LUMBOSACRAL STRAIN, S/P R SIDED RIB TRAUMA , BILATERAL HAMSTRING STRAIN, R SHOULDER ARM AND FOREARM STRAIN, NECK AND BACK PAIN , On April 12, 2004 , I the Plaintiff, Stephanie Lynn Ford were released by Dr. Ross Ufberg to return to work at Christiana Care Health Systems. On April 13, 2004 I the Plaintiff was cleared for work by the Christiana Care Health Systems Employee Health Nurse and were assigned a job recruiter (defendant Richard Burton ) by the Human Resources Department for a job placement. The assigned job recruiter Richard Burton setup an appointment with me for April 16, 2004 , at 2:00 pm. The defendant Richard Burton instructed me to apply on-line via the internet for employment and that my old position in the Radiology Department has been filled. On April 20, 2004 , the Defendant Unum Life Insurance Company Of America in another Civil Action Lawsuit No. 05-118 (KAJ) denied plaintiffs' request for Long Term Disability Benefits. On April 23, 2004, I the plaintiff Stephanie Lynn Ford called the defendant via- telephone Richard Burton in reference to a job placement and he directly told me quote " FIND OTHER EMPLOYMENT AT



ANOTHER CORPORATION “ end quote. I the Plaintiff Stephanie Lynn Ford called the defendant Richard Burton on April 27, 2004 at 9:30 am . No return phone call or response, on April 30, 2004 , no return phone call or response from the defendant Richard Burton. I the Plaintiff, Stephanie Lynn Ford have applied for 29 jobs at the Christiana Care Health Systems from April 12, 2004 to July 2, 2004, Please see attached Intensive Job Search Log Sheets. I the Plaintiff, Stephanie Lynn Ford appealed the Denial Letter from the Defendant Unum Life Insurance Company Of America for Long Term Disability Benefits on April 24, 2004. Defendant, Richard Burton / Professional Job Recruiter / resides at , or its business is located at 200 Hygeia Drive Newark, Delaware 19713 Human Resources Department . Defendant, Unum Life Insurance Company Of America / Steven & Lee / Mr. Walter P. McEvilly Jr. resides at , or its business is located at 1105 North Market Street 7<sup>th</sup> Floor , Wilmington , Delaware 19801. On May 28, 2004 , I the plaintiff, Stephanie Lynn Ford applied for the position in the Medical Records Department as a Clerk 03 position,\_\_\_ I THE PLAINTIFF WANT TO INFORM THE COURT THAT I HAD PREVIOUS WORKED IN THIS SAME POSITION PRIOR FOR 9 YEARS AND WAS REFUSED THIS POSITION BY THE DEFENDANT MRS. CLARA CLARK . Defendant, Clara Clark / Medical Records Supervisor / resides at , or its business is located at 200 Hygeia Drive Newark , Delaware 19713. I the Plaintiff called the Defendant Clara Clark via-telephone and explain my situation to her about the automobile accident, and that I needed a job and wanted to work, Consequently, she refused me the position. On June 28, 2004 , The Defendant, Unum Life Insurance Company Of America sent another letter of Denial for Long Term Disability Benefits

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There are many reasons why the Court should grant the Plaintiff, Stephanie Lynn Ford's summary judgment against the defendants Christiana Care Health Systems, Richard Burton and Clara Clark. For one, the defendants refused to rehire the plaintiff after returning to work from sick leave (FMLA). The defendant Richard Burton refused to place the plaintiff in a job position equal to my last pay grade worked or any other open position that were available. Which there were open positions, I the plaintiff, Stephanie Lynn Ford have applied for 29 jobs during this time at Christiana Care Health Systems, and was told by Richard Burton and other job recruiters that I did not qualify for any of the jobs that I applied for, which I find to be unheard of, because I had already worked in the Medical Records Department for 9 years as a perm file clerk, and this very same job was available on April 12, 2004 in fact, I the plaintiff applied for this particular job on May 28, 2004 Please see Health Records Clerk position on the intensive job search log, and the defendants Clara Clark and Richard Burton refuse to rehire me in this position as well. I the plaintiff have worked for the defendant Clara Clark for 9 years in the Medical Records Department. I worked with the defendant Clara Clark from year 1994 to year 2002, and then working about six months in the Radiology Department as a clerk, plaintiff's supervisors were Mrs. Sharon Peitlock and Mrs. Edith Green-Crews. Secondly, the court should grant plaintiff's summary judgment because the defendants wrongfully terminated the plaintiff's pension benefits and retiree medical benefits.

Although, Sharon Peitlock and Edith Green-Crews are not defendants on this motion, however, I the plaintiff Stephanie Lynn Ford am asking this Honorable Court if I am able to file new additional charges against Sharon Peitlock and Edith Green-Crews for illegally terminating the plaintiff's pension benefits and retiree medical benefits. And if so, I the plaintiff would like to file the new charges, Please respond on this matter as soon as possible respectfully. On April 16, 2004 I the plaintiff met with Richard Burton in person at 2:00 pm, The defendant Richard Burton instructed me to apply on-line for employment and that my old position in the Radiology Department has been filled. And I the plaintiff on numerous occasion have tried calling Sharon Peitlock and Edith Green-Crews via-telephone, left phone messages on there voice mail and neither one of them would return my phone calls. What, I the plaintiff don't understand and having a very hard time emotionally and psychologically dealing with is the fact that Sharon Peitlock and Edith Green-Crews both were informed that I the plaintiff Stephanie Lynn Ford was returning to work on the April 12, 2004, and for them to terminated the pension benefits on April 13, 2004 is just pure race discrimination, at its highest form, because if Richard Burton were doing his job properly, if he's aware and able to inform me of my old job has been filled, <sup>AT</sup> <sub>^</sub> than some point or another he has spoken with Sharon Peitlock and Edith Green-Crews and Clara Clark, they terminated the pension benefits on April 13, 2004 and I the plaintiff met with Richard Burton face to face on April 16, 2004 at 2:00 pm for employment and he



new then what they were doing and why he could not give me a job. I have attached the pension forms D0197 and D0195 that I have receive from Kendra L. Baisinger , Esq. Morgan , Lewis & Bockus LLP , 1701 Market Street , Philadelphia, PA 19103. Another reason the court should grant the plaintiff's summary judgment is because the defendant Richard Burton intentionally refused to rehire the plaintiff for employment , wrongfully terminated the plaintiff's \$ 75,000 Life Insurance Policy , wrongfully terminated the plaintiff's medical benefits, dental benefits, long-term disability benefits, and personal accident insurance. The defendant Richard Burton refuse to rehire the plaintiff on April 16, 2004, when I met with him face to face , when in fact legally all of the benefits that I the plaintiff had purchase through the employer Christiana Care Health Systems does not expire until the end of every month. Why wasn't I the plaintiff able to be rehired at Christiana Care Health Systems before any of the benefits expire, because they were paid up to the end of the month. A third reason, the court should grant the plaintiff's summary judgment is because Clara Clark, Sharon Peitlock, Edith Green-Crews and Richard Burton all have worked against me, to not to be working at Christiana Care Health Systems, they have went as far saying to other employees that I the Plaintiff have a body odor , and this was told to me by other employees that Clara Clark was the one telling this to other employees around the hospital, however, Clara Clark failed to inform them that Stephanie Lynn Ford had an emergency hysterectomy due to an excessive bleeding (menstrual cycle can last for as long as 1 to 12 days ) while working in the Medical Records under Clara Clark supervision in the year of 1999, she also failed to inform the employees that I didn't receive a get well card until I return back to work in the Medical Records department. This was major surgery and for Clara Clark or any other employee to speak negative about me or my personal hygiene is very very sad, I the plaintiff have never disrespected my co-workers in no way shape or form, I was never raised this way , I am from well respected parents here in this city , and was always taught that if you can't say something nice about someone, don't say anything at all about a person, because you don't know what a person is going through. It is a Disgrace for anyone to lose there pension and lively hood , because of Clara Clark, Richard Burton , Sharon Peitlock and Edith Green-Crews discriminatory actions.



### III. STATEMENT OF FACTS

Plaintiff's complaint involves a claim for violation of Civil Rights Act Of 1991 Title I , Violation of Title V of The Americans with Disabilities Act (ADA), Title VII of The Civil Rights Act of 1994 , Race Discrimination, Employment Discrimination, Violation of The Family Medical Leave Act of 1993 (FMLA) Violation of The ERISA Act, 29 U.S.C. 1132, Wrongful Termination of Plaintiff's Pension Benefits, Wrongful Termination of Plaintiff's \$ 75,000 Life Insurance Policy , Wrongful Termination of Plaintiff's Health Insurance Benefits. I the Plaintiff have been working at Christiana Care Health Systems for the pass 17 years , from August 1987 to October 27, 2003 . The last position I worked was a Radiology Clerk 03 under the supervision of Sharon Peitlock and Edith Green-Crews -- from 8:00 am to 4:00 pm . Monday thru Friday and a 2<sup>nd</sup> job at St. Francis Hospital as a housekeeper from 6:00 pm. To 11:00 pm, Monday , Wednesday , Friday and every other Saturday and Sunday. Plaintiff's primary duties as a radiology clerk is to maintain the flow of patients x-ray films , cat scans , and process mammography films, answer telephone request from other facilities, from patients, and doctors offices. Prepare patients x-ray films for pick-up and to be sent to other hospitals and doctors offices. File x-ray films and cat scan films . Plaintiff had been working in the Radiology department clerk position for less than a year, previously she worked as a medical records clerk for 9 years of the 17 years.

The Radiology department was short handed when the plaintiff began working in the department. Plaintiff 's normal work day, at 8:00 am to 4:00 pm. Plaintiff covers the x-ray film dark room on the 2<sup>nd</sup> floor of the radiology department, in the dark room plaintiff process patients mammogram films and chest x-ray films , until 11:30 , lunch from 11:30 to 12:00 pm, After lunch, plaintiff reports to the 1<sup>st</sup> floor x-ray file area, there the plaintiff answer the phone from patients and doctors offices, remove films from the wet room area and place them in the appropriate film jacket and send the films to the basement. At around 2:00 in the afternoon , plaintiff is to report to the basement, there she is to refile all of the x-ray films that were from the 1<sup>st</sup> and 2<sup>nd</sup> floor, along with answering the telephone requests from other hospitals, patients and doctors offices.

At 6:00 pm, Plaintiff reports to her part time 2<sup>nd</sup> job at St. Francis Hospital as a housekeeper from 6:00pm. To 11:00pm. Monday, Wednesday , Friday and every Saturday and Sunday . Plaintiff's primary

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duties were to clean patients rooms for a clean environment, such as making the patients beds, cleaning the restrooms, and mopping the floors, assisting the nurses technicians as needed.

On October 27, 2003, I the plaintiff Stephanie Lynn Ford was in a hit and run automobile accident suffering back and neck pain , right rib pain. There was a witness to the accident and she called the licensed plate number into the Delaware State Police, accident causing \$14,00 damages to the plaintiff's pick-up truck. Plaintiff began to experience back neck pain, right rib pain. Plaintiff went St. Francis Hospital emergency room for treatment, plaintiff was x-rayed and given medication for pain. Plaintiff was released with a referral to family doctor. As time went on, the pain in my rib area had become so severe, plaintiff could barely walk upright. On October 30, 2003, Plaintiff was seen by Dr. Ross Ufberg M.D. and he concluded that the plaintiff suffered from a strain to her cervical, thoracic and lumbosacral spine, rib trauma, hamstring strain, and arm shoulder and forearm strain. Plaintiff received treatment from the Wilmington Pain & Rehabilitation Center, out patient therapy, medications, motrin 600mg, flexural 5mg Tylenol 500mg. Plaintiff was under the doctors care from October 30, 2004 to April 13, 2004 from Christiana Care Health Systems and St. Francis Hospital.

#### THE PLAN

There are many critical issues in this case with Christiana Care Health Systems, Richard Burton and Clara Clark, along with the wrongful Termination of Benefits case with Unum Life Insurance Of America. I the Plaintiff, Stephanie Lynn Ford ask this Honorable Court to apply the law to all of the Defendants unlawful activities.

#### PLAINTIFF' MEDICAL EVIDENCE

I the Plaintiff was involved in a automobile accident on October 27, 2003, and suffered back, neck and right rib pain . Treating physician Dr. Ross M. Ufberg M.D. 1021 Gilpin Avenue, Suite 101 Wilmington, Delaware 19806 (302) 575-1776 and St. Francis Hospital 7<sup>th</sup> & Clayton Street Wilmington, Delaware 19805, Dr. Timothy Dowling , I the plaintiff have been experiencing a great of pain to my right

rib , which have swelled and have been causing me a lot of discomfort. I the plaintiff have enclosed a photograph along with copies of all medical records and disability certificates dated October 28, 2003 to Present. I the plaintiff scheduled the necessary management treatment to get well to be able to go back to her normal work schedule at Christiana Care Health Systems and St. Francis Hospital.

#### REVIEW OF THE MEDICAL RECORDS

I the Plaintiff, Stephanie Lynn Ford ask this a Honorable Court to reevaluate medical records and the facts of this case, and grant Plaintiff's motions against the Defendants, Christiana Care Health Systems, Richard Burton, and Clara Clark along with Unum Life Insurance Company Of America's pending civil action claim.

#### IV. ARGUMENT

The Court should grant plaintiff's motion for summary judgment because the plaintiff has an actionable claim against the Defendants for violation of the Plaintiff's Civil Rights Act Of 1991 Title I, in violation of the Title V of The American with Disability Act (ADA), in violation of Title VII of The Civil Rights Act of 1994, Race Discrimination, in violation of Employment Discrimination, in violation of The Family Medical Leave Act of 1993 ,( FMLA), in violation of The ERISA Act, in violation of 29 U.S.C. 1132, wrongful termination of Plaintiff's Pension Benefits, wrongful termination of Plaintiff's Retiree Medical Benefits, wrongful termination of Plaintiff's \$75,000 Life Insurance Policy, wrongful termination of Plaintiff's Health Insurance Benefits.

I the plaintiff ask this Honorable Court to grant the motion against the defendants in this case.

A. Plaintiff has an actionable Claim against the defendants for all there wrong doing in this case, by terminating the plaintiff's pension benefits, retiree medical benefits, medical benefits , \$75,000 life insurance policy, I the plaintiff had been working at the Christiana Care Health Systems for the past 17

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years and I had plan to retire from the company. It is very sad that these defendants have taking my lively hood, every thing that I had build and worked for .

B. All of the Defendants in this case and the case with Unum Life Insurance Of America, were all working together, this is the reason why the plaintiff was unable to receive long-term disability benefits that I paid into to use when I become ill and unable to work, or able to be rehired for employment , after working 17 years of service, and the termination of the plaintiff's pension benefits and retiree medical benefits.

1. The federal and state laws on employers terminating employees pension benefits with out any due process of the law.

I the Plaintiff, Stephanie Lynn Ford ask this Honorable Court To Apply The Law To These Claims.

2. The Plan Is Governed By ERISA

I the Plaintiff, Stephanie Lynn Ford ask this Honorable Court To Apply The Law To These Claims.

#### Race Discrimination Claim

I the Plaintiff , Stephanie Lynn Ford honestly feel that I was discriminated against, because I am a black female African American.

C. I THE PLAINTIFF, STEPHANIE LYNN FORD ASKED THIS HONORABLE COURT TO GRANT PLAINTIFF'S COMPLAINT AND SUMMARY JUDGMENT.

1. The defendant intentionally terminated the plaintiff's benefits, and refuse to rehire the plaintiff without any due process of the Law.

2. The Defendants, Christiana Care Health Systems, Richard Burton and Clara Clark are in violation of Race Discrimination and among other illegal violations.

# EXHIBIT A

Paul, Elaine

1987

From: FWZBXQ0@christianacare.org  
Sent: Friday, April 23, 2004 2:06 PM  
To: FormHRCCHSHRPemp@christianacare.org  
Cc: FWZBXQ0@christianacare.org; vfleiner@christianacare.org  
Subject: FORD, STEPHANIE - TERMINATION FORM

The following information was submitted from an INet Form called  
TERMINATION FORM by Green-Crews, Edith.

Employment Assignment: - FormHRCCHSHRPemp@christianacare.org  
\*Employee Name: - FORD, STEPHANIE  
\*Employee SSN#: - 222565931  
\*Cost Center: - 26541  
\*Last Day Worked: - 10/27/03 ✓  
\*Term Effective Date: - 04/13/04 ✓  
\*Eligible for Unused PTO Hrs: - Yes ✓  
\*Would You ReEmploy: - Yes ✓  
Voluntary Reason Code: - 100 Unable to Return from Medcial LOA  
Involuntary Reason Code: - None  
Comments: - EMPLOYEE HAS EXHAUSTED HER 24 WK LEAVE P  
ERIOD.

\*Approval: - PEITLOCK, SHARON  
Date Completed: - 4/23/2004  
Completed By: - Green-Crews, Edith

Date Sent: 4/23/04  
Time Sent: 2:06:05 PM

D0195

1 mlp  
5/5/04

114



PENSION INFORMATION

DATE NOVEMBER 14, 2006

NAME OF PENSIONER: STEPHANIE FORD  
SOCIAL SECURITY NO: 222-56-5931  
DATE OF BIRTH: 02/16/1962 POSITION: CLERK III  
DEPARTMENT/DIVISION: X-RAY - WILMINGTON  
EMPLOYMENT DATE: 08/24/1987  
SEVERANCE FROM SERVICE DATE: 04/13/2004  
RETIREMENT DATE: 03/01/2027  
TYPE OF RETIREMENT: TERMINATED VESTED  
DATE PAYMENTS COMMENCE: 03/01/2027  
PARTICIPATION DATE: 07 MOS 24 DAYS PT  
CREDITED SERVICE: 15 YRS 11 MOS 25 DAYS FT (.16267)  
FINAL AVERAGE EARNINGS (Monthly) \$2127.14  
SETTLEMENT OPTION: -----  
ANNUAL AMOUNT: \$4671.24  
MONTHLY INCOME: \$389.27  
AGE AT TERMINATION: 42 YRS 01 MOS 27 DAYS  
NRD: 03/01/2027

D0197

(15)



SECTION I - TO BE COMPLETED FOR ALL REFERRALS BY DEPARTMENT HEAD OR SUPERVISOR (INSTRUCTIONS ON BACK)

NAME (LAST)	NAME (FIRST)	NAME (M.I.)	DATE	(TO BE COMPLETED BY THE TREATING FACILITY)	
				TIME IN	TIME OUT
CITY	DEPT/UNIT	SOCIAL SECURITY NUMBER	JOB TITLE	DATE OF BIRTH	HOME PHONE

EDICAL AUTHORIZATION:

understand that Christiana Care maintains information in paper and electronic form.  
authorize EHS to access Christiana Care's information pertinent to my care

SYMPTOM OR PROBLEM:

EMPLOYEE SIGNATURE

1. ☐ OCCUPATIONAL INJURY/ILLNESS - COMPLETE BELOW

2. ☐ NON OCCUPATIONAL INJURY ILLNESS

AUTHORIZE SIGNATURE/SUPERVISOR OR MANAGER:

ACCIDENT OCCURRED	HOSPITAL/SITE	DEPT / UNIT	DATE OF INJURY	HOUR OF DAY	MACHINE, TOOL OR OBJECT CAUSING INJURY / ILLNESS
THIS SECTION IS REQUIRED FOR OCCUPATIONAL INJURIES		LOCATION WHERE INJURY OCCURRED	DATE SUPERVISOR NOTIFIED	SUPERVISOR'S NAME	PHONE:

FULL DESCRIPTION OF INJURY (DESCRIBE EXACTLY WHAT HAPPENED IN ORDER OF EVENTS AND WHY IT HAPPENED. INDICATE APPARENT INJURY AND CONDITION OF EQUIPMENT OR APPAREL WHERE SIGNIFICANT)

WITNESS:

SECTION II - TO BE COMPLETED BY PHYSICIAN AND/OR NURSE

DISPOSITION:

- ☒ CLEARED FOR WORK  
☐ SEND HOME  
☐ REMAIN ON DUTY

RESTRICTIONS: 15 hr lifting restriction

2 STATUS:

☒ OCCUPATIONAL INJURY/ILLNESS  
☒ NON-OCCUPATIONAL INJURY/ILLNESS

☐ REVIEW: (Reason)

REFERRED TO:	APPT:	PROVIDER	RETURN VISIT DATE	RTW DATE
		Dr. [Signature]		4-13-04

To: Dr. Robert Laskowski  
Christiana Care Health Services  
Board of Directors  
P.O.Box 6001  
Newark, Delaware 19718  
October 17, 2004

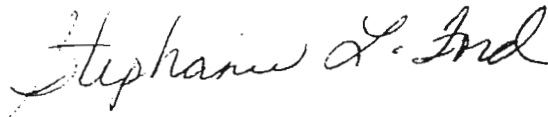
From: Stephanie Ford  
19 Albany Ave  
NewCastle,De. 19720  
(302)658-6740

RE: Consideration of Denial of My Disability Benefits from Unum Provident Insurance  
Related to Injuries and Employment Status.

Dear Dr. Laskowski

I am writing this letter to request a special hearing be held with me and my  
Representatives; to discuss the action of the Administrative staff of the hospital  
In consultation with the insurance company of UmunProvident, has taken regarding  
Me and my employment at the hospital.  
I request that this meeting be held as soon as possible.

Sincerely yours,



CC: PF





STEPHANIE FORD  
RIGHT RAIN (RIB)  
10/28/03 ACCIDENT

421-4441  
ST. FRANCIS FAMILY PRACTICE  
AARON M. ROBINSON, D.O.  
7TH & CLAYTON STREETS  
WILMINGTON, DE 19805  
(302) 575-8040 LIC. # C7-0003036

NAME Stephanie Ford AGE \_\_\_\_\_  
ADDRESS \_\_\_\_\_ DATE 1/24/07

Rx ILLEGAL IF NOT SAFETY-BLUE BACKGROUND  
R

Ultra Sound of  
(R) upper Quadrant.  
ATTN - Palpable lump  
in (R) Flank  
Dx: painful palpable lump.

Refill \_\_\_\_\_ times

Substitution Permitted

IN ORDER FOR A BRAND NAME PRODUCT TO BE DISPENSED, THE  
PRESCRIBER MUST HAND WRITE "BRAND NECESSARY" OR "BRAND  
MEDICALLY NECESSARY" IN THE SPACE BELOW.

6GFP0276241

19

ST. FRANCIS HOSPITAL  
7th & CLAYTON STREETS  
WILMINGTON, DE 19805-0500

DEPARTMENT OF  
RADIOLOGY  
(302) 421-4300

RADIOLOGIC CONSULT

Pt Name: FORD, STEPHANIE L  
19 ALBANY AVENUE  
NEW CASTLE, DE 19720  
PHONE: (302) 658-6740  
DOB: 02/16/1962

MR#: W2447514  
ACCT#: W005352935  
RM/BED: UNK

DATE OF SVC: 10/27/2003  
ATTENDING DR.: UNK  
ORDERING DR.: Ward, Mariann CFNP  
EXAMS: RIBS UNI 3+ VIEWS-RT 1148723 (71101)  
COPIES TO: Singh, Narinder M.D.; Ward, Mariann CFNP; FWD ER PHYSICIANS~

EXAM REASON: MVA THIS PM; MID RT SIDED RIB PAIN SINCE MVA

READING DR: Steven D. Herman M.D.

SIGNED BY:

REPORT OF FINDINGS

Study: Right ribs

History: Right sided rib pain following MVA

Images of the right rib cage were obtained in multiple degrees of obliquity. There is no evidence of rib fracture, lytic or blastic bony lesions, pleural effusion, pneumothorax or other significant abnormality.

Impression: Normal study.

Dictated: 10/29/03 1154

---- Electronic Signature on File ----  
Signed By: Herman, Steven D M.D.



ROSS M. JFBERG, M.D.  
WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
1021 GILPIN AVENUE, SUITE 101  
WILMINGTON, DELAWARE 19806  
TELEPHONE (302) 575-1776

## DISABILITY CERTIFICATE

Date: 5/3/04

To Whom It May Concern:

This is to certify that:

Stephanie Ford

has been under my professional care and was

☒ Totally incapacitated☐ Partially incapacitated

from job  
duties at  
St. Francis

from 5/3/04 to 6/20/04 \*

secondary to a:

☒ motor vehicle accident on 10/27/03☐ work accident on \_\_\_\_\_☐ illness☐ other

Remarks: \_\_\_\_\_

Signed: [Signature]

\*patient to be re-evaluated prior to any change in disability status.

(29)

DEA # \_\_\_\_\_

ROSS M. UFBERG, M.D.  
1021 GILPIN AVENUE  
SUITE 101  
WILMINGTON, DE 19806  
302-575-1776

NAME Stephanie Ford  
ADDRESS \_\_\_\_\_ DATE 4/13/04

**R** (Please Print)

Ms Ford is cleared for  
return to work with  
15 lb lifting restrictions  
effective 4/13/04

REFILL \_\_\_\_\_ TIMES

[Signature] M.D.  
SUBSTITUTION PERMITTED

IN ORDER FOR A BRAND NAME PRODUCT TO BE DISPENSED, PRESCRIBER MUST HANDWRITE  
'BRAND NECESSARY' OR 'BRAND MEDICALLY NECESSARY' IN THE SPACE BELOW.

30

ROSS M. LEBERG, M.D.  
WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
1021 GILPIN AVENUE, SUITE 101  
WILMINGTON, DELAWARE 19806  
TELEPHONE (302) 575-1776

## DISABILITY CERTIFICATE

Date: 3/27/04

To Whom It May Concern:

This is to certify that:

Stephanie Ford

has been under my professional care and was

☐ Totally incapacitated☒ Partially incapacitatedfrom 4/13/04 to 5/13/04 \*

secondary to a:

☒ motor vehicle accident on 10/27/02☐ work accident on \_\_\_\_\_☐ illness☐ otherRemarks: Part-time work status4 hours / day at Christian CareSigned: [Signature]

\*patient to be re-evaluated prior to any change in disability status.

(31)

ROSS M. UFBERG, M.D.  
 WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
 1021 GILPIN AVENUE, SUITE 101  
 WILMINGTON, DELAWARE 19806  
 TELEPHONE (302) 575-1776

## DISABILITY CERTIFICATE

Date: 3/22/04

To Whom It May Concern:

This is to certify that:

Stephanie Ford

has been under my professional care and was

☒ Totally incapacitated from job  
duties at St. Francis  
 from 4/13/04 to 5/13/04

secondary to a:

- ☒ motor vehicle accident on 10/27/03  
☐ work accident on \_\_\_\_\_  
☐ illness  
☐ other

Remarks: \_\_\_\_\_

Signed: \_\_\_\_\_

Don & Wynne

\*patient to be re-evaluated prior to any change in disability status.

ROSS M. UFBERG, M.D.  
 WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
 1021 GILPIN AVENUE, SUITE 101  
 WILMINGTON, DELAWARE 19806  
 TELEPHONE (302) 575-1776

## DISABILITY CERTIFICATE

Date: 3/29/04

To Whom It May Concern:

This is to certify that:

Stephanie Ford

has been under my professional care and was

☒ Totally incapacitated  
☐ Partially incapacitated  
 from 3/29/04 to 4/12/04

secondary to a:

- ☒ motor vehicle accident on 10/27/03  
☐ work accident on \_\_\_\_\_  
☐ illness  
☐ other

Remarks: \_\_\_\_\_

Signed: \_\_\_\_\_

Don & Wynne

\*patient to be re-evaluated prior to any change in disability status.

(32)

ROSS M. UFBERG, M.D.  
WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
1021 GILPIN AVENUE, SUITE 101  
WILMINGTON, DELAWARE 19806  
TELEPHONE (302) 575-1776

DISABILITY CERTIFICATE

Date: 2/23/04

To Whom It May Concern:

This is to certify that:

Stephanie Ford

has been under my professional care and was

☒ Totally incapacitated

☐ Partially incapacitated

from 2/23/04 to 3/29/04 \*

secondary to a:

- ☒ motor vehicle accident on 10/27/03
- ☐ work accident on \_\_\_\_\_
- ☐ illness
- ☐ other

Remarks: \_\_\_\_\_

Signed: \_\_\_\_\_

Ross M. Ufberg

\*patient to be re-evaluated prior to any change in disability status.

(B3)

ROSS M. C. BERG, M.D.  
WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
1021 GILPIN AVENUE, SUITE 101  
WILMINGTON, DELAWARE 19806  
TELEPHONE (302) 575-1776

DISABILITY CERTIFICATE

Date: 1/20/04

To Whom It May Concern:

This is to certify that:

Stephane Ford

has been under my professional care and was

☒ Totally incapacitated

☐ Partially incapacitated

from 1/20/04 to 2/23/04 \*

secondary to a:

☒ motor vehicle accident on 10/27/03

☐ work accident on \_\_\_\_\_

☐ illness

☐ other

Remarks: \_\_\_\_\_

Signed: Don A. Berg MD

\*patient to be re-evaluated prior to any change in disability status.

(34)



ROSS M. UFBERG, M.D.  
WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
1021 GILPIN AVENUE, SUITE 101  
WILMINGTON, DELAWARE 19806  
TELEPHONE (302) 575-1776

DISABILITY CERTIFICATE

Date: 12/22/03

To Whom It May Concern:

This is to certify that:

Stephanie Ford

has been under my professional care and was

☒ Totally incapacitated

☐ Partially incapacitated

from 12/22/03 to 1/20/04 \*

secondary to a:

☒ motor vehicle accident on 10/27/03

☐ work accident on \_\_\_\_\_

☐ illness

☐ other

Remarks: \_\_\_\_\_

Signed: \_\_\_\_\_

\*patient to be re-evaluated prior to any change in disability status.

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ROSS M. L. BERG, M.D.  
WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
1021 GILPIN AVENUE, SUITE 101  
WILMINGTON, DELAWARE 19806  
TELEPHONE (302) 575-1776

DISABILITY CERTIFICATE

Date: 12/4/03

To Whom It May Concern:

This is to certify that:

Stephanie Ford

has been under my professional care and was

☒ Totally incapacitated

☐ Partially incapacitated

from 12/4/03 to 1/4/04 \*

secondary to a:

☒ motor vehicle accident on 10/27/03

☐ work accident on \_\_\_\_\_

☐ illness

☐ other

Remarks: \_\_\_\_\_

Signed: Dr. Ross M. Berg

\*patient to be re-evaluated prior to any change in disability status.

(36)

ROSS M. UFBERG, M.D.  
WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
1021 GILPIN AVENUE, SUITE 101  
WILMINGTON, DELAWARE 19806  
TELEPHONE (302) 575-1776

DISABILITY CERTIFICATE

Date: 11/10/03

(to be filled in by physician)

This is to certify that

Stephanie Ford

has been under my professional care and has

☒ Totally Incapacitated

☐ Partially Incapacitated

from 11/10/03 to 12/31/03

secondary to:

☒ motor vehicle accident on 10/27/03

☐ work accident on \_\_\_\_\_

☐ illness

☐ other \_\_\_\_\_

Revised:

Signed: [Signature]

\*patient to be re-evaluated prior to any change in disability status

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ROSS M. UFBERG, M.D.  
WILMINGTON PAIN & REHABILITATION CENTER, P.A.  
1021 GILPIN AVENUE, SUITE 101  
WILMINGTON, DELAWARE 19806  
TELEPHONE (302) 575-1776

DISABILITY CERTIFICATE

Date 10/27/03

To Whom It May Concern:

This is to certify that:

Stephanie Ford

has been under my professional care and was

☒ Totally incapacitated

☐ Partially incapacitated

from 10/27/03 to 11/16/03

secondary to a:

☒ motor vehicle accident on 10/27/03

☐ work accident on \_\_\_\_\_

☐ illness

☐ other

Remarks \_\_\_\_\_

Signed Thom L. Ufberg

\*To be re-evaluated upon any change in disability status.

(38)

Name Stephanie Ford

Week \_\_\_\_\_ of \_\_\_\_\_

Dates 5/18/04 to 5/21/04

INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal, form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date \_\_\_\_\_ Job Title \_\_\_\_\_ Telephone // Fax // \_\_\_\_\_ Company/Contact Name \_\_\_\_\_ E-mail \_\_\_\_\_

5/21/04 Team Coordinator / <sup>8th Recruiter</sup> <sup>(302)</sup> Burton 428-5746 / Christiana Care Hospital / completed application

5/21/04 Unit Clerk VI / <sup>(302)</sup> 428-5746 / Christiana Care Hospital / completed application

5/21/04 Patient Information Rep. / <sup>(302)</sup> 428-5746 / Christiana Care Hospital / completed application

5/21/04 Patient Care Technician / <sup>(302)</sup> 428-5746 / Christiana Care Hospital / completed application

5/21/04 Case Reviewing Clerk / <sup>(302)</sup> 428-5746 / Christiana Care Hospital / completed application

To Search results verified by: \_\_\_\_\_

Date: \_\_\_\_\_

Additional Comments:

WCCIC \_\_\_\_\_

Name Stephanie Ford

Dates 5/24/04 to 5/28/04

**INTENSIVE JOB SEARCH LOG**

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax (name, initial, form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone # / Fax #	Company/Contact Name	Results
5/28/04	Clerk	(302) 428-5746	Christiana Care Hospital / Burton	Mr. Burston / completed application
Notes	My job recruiter is Mr. Rich Burston (302) 428-5746			
5/28/04	Unit Clerk	(302) 428-5746	Christiana Care Hospital / Burton	completed application
Notes				
5/28/04	Clerk	(302) 428-5746	Christiana Care Hospital / Burton	completed application
Notes				
5/28/04	Duplications Operator	(302) 428-5746	Christiana Care Hospital / Burton	completed application
Notes				
5/28/04	Health Records Clerk	(302) 428-5746	Christiana Care Hospital / Burton	completed application
Notes				
Job Search results verified by:	Date:			

Additional Comments:



Name Stephanie FordWeek 114Dates 6/31/04 to 6/4/04INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax, time, initial form, copy of newspaper ad, email address of job listing, copy of website postings, etc. Minimum of 5 job searches per week.

Date \_\_\_\_\_ Job Title \_\_\_\_\_ Telephone // Fax // \_\_\_\_\_ Company/Contact Name \_\_\_\_\_ Initials \_\_\_\_\_

1. 6/4/04 OR Tech (302) 428-5746 / Christiana Care Hospital / Boston / Complete application

Notes \_\_\_\_\_

2. 6/4/04 Admin. Asst. III (302) 428-5746 / Christiana Care Hospital / Boston / Complete application

Notes \_\_\_\_\_

3. 6/4/04 Clerk II (302) 428-5746 / Christiana Care Hospital / Boston / Complete application

Notes \_\_\_\_\_

4. 6/4/04 Clerk II (302) 428-5746 / Christiana Care Hospital / Boston / Complete application

Notes \_\_\_\_\_

5. 6/4/04 Career Development (302) 428-5746 / Christiana Care Hospital / Boston / Complete application

Notes \_\_\_\_\_

6 \_\_\_\_\_

Notes \_\_\_\_\_

Job Search results verified by : \_\_\_\_\_

Date: \_\_\_\_\_

Additional Comments:

Name Stephanie FordDates 6/7/04 to 6/11/04INTENSIVE JOB SEARCH LOG

Please provide &amp; submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone #/Fax #	Company/Contact Name	Results
6/11/04	Home Health Assistant	(302) 428-5746	Christiana Care Hospital	Completed application
Notes	Interview - 6/9/04 clerk position / Christiana Care Hospital / 5C 5th floor.			
6/11/04	Bank -	(302) 428-5746	Christiana Care Hospital	Completed application
Notes				
6/11/04	Consignment Consultant -	(302) 428-5746	Christiana Care Hospital	Completed app
Notes				
6/11/04	Service Consultant -	(302) 428-5746	Christiana Care Hospital	Completed app
Notes				
6/11/04	Scheduler -	(302) 428-5746	Christiana Care Hospital	Completed app
Notes				
6/12/04	Correctional Officer	(302) 739-5458	The Employee Relations Center	Completed application
Notes				

Job Search results verified by :

Date:

Additional Comments:

Call Delaware Tech College  
 Mrs. Cecelia  
 (302) 830-5209

Additional Comments:  
 A Modified M.A. 100, was

Have appointment with Dr. 6/15/04  
 Information Session at Delaware Tech  
 August 5, 2004  
 10:00 To 12:00

(72)

Name Stephenie FordWeek      of 4Dates 6/14/04 to 6/18/04INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax (transmittal form, copy of newspaper ad, email address of job listing, copy of website posting, etc.) Minimum of 5 job searches per week.

Date	Job Title	Telephone // Fax //	Company/Contact Name	Results
6/15/04	Medical Records Clerk	(302) 451-4000	A.I. Dupont Hospital	Completed Application
Notes	standing out of			
6/15/04	Environmental Services		St. Francis Hospital	Completed Application
Notes				
6/18/04	Home Health Training Program	(302) 428-5746	Christiana Care Hospital	Completed Application
Notes				
6/18/04	Assistant Program	(302) 428-5746	Christiana Care Hospital	Completed Application
Notes				
6/18/04	Security Officer	(302) 428-5746	Christiana Care Hospital	Completed Application
Notes				
6/18/04				
Notes				

Job Search results verified by: \_\_\_\_\_ Date: \_\_\_\_\_

Additional Comments: \_\_\_\_\_



Name Stephanie Paul

Dates 6/21/04 to 6/25/04

**INTENSIVE JOB SEARCH LOG**

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone // Fax //	Company/Contact Name	Results
6/24/04	Residency Program Assistant		Christiana Care Hospital	Completed application
6/24/04	Collection Specialist		Christiana Care Hospital	Completed application
6/24/04	Operations Support Specialist		Delaware Psychiatric Center	Completed application
6/25/04	Home Health Assistant		Christiana Care Hospital	Completed application
6/25/04	Special Technician		Christiana Care Hospital	Completed application
6/25/04	Receptionist		Christiana Care Hospital	Completed application

Additional Comments:

Date:

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Name Stephanie Ford  
Dates 6/28/04 to 7/1/04

INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax (trans mitted) daily, copy of newspaper ad, email address of job listing, copy of website postings, etc. Minimum of 5 job searches per week.

Date \_\_\_\_\_ Job Title \_\_\_\_\_ Telephone // Fax // \_\_\_\_\_ Company/Contact Name \_\_\_\_\_ Results \_\_\_\_\_

Notes Interview - 7/2/04 Clerk position/Chautauque Hospital career center

Notes \_\_\_\_\_

Notes \_\_\_\_\_

Notes \_\_\_\_\_

Notes \_\_\_\_\_

Notes \_\_\_\_\_

Search results verified by: \_\_\_\_\_ Date: \_\_\_\_\_

Additional Comments:

Name Stephanie Ford

Week \_\_\_\_ of 4

Dates 7/5/04 to 7/9/04INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone # /Fax #	Company/Contact Name	Results
1 <u>7/7/04</u>	<u>clerk</u>	<u>802 395-0400</u>	<u>Stroter Services Group</u>	<u>Completed application</u>
Notes				
2 <u>7/7/04</u>	<u>Security Officer</u>		<u>Bennett Security Service</u>	<u>Completed application</u>
Notes				
3 <u>7/8/04</u>	<u>Security Officer</u>		<u>Allied Security</u>	<u>Completed application</u>
Notes				
4 <u>7/8/04</u>	<u>Meets temp service - Security Officer</u>			
Notes				
5				
Notes				
6				
Notes				

Job Search results verified by: \_\_\_\_\_ Date: \_\_\_\_\_

Additional Comments:

CARING

EXCELLENCE

INTEGRITY

LEADERSHIP

PRIDE

TEAMWORK

# CERTIFICATE OF APPRECIATION



CHRISTIANA CARE

Presented to

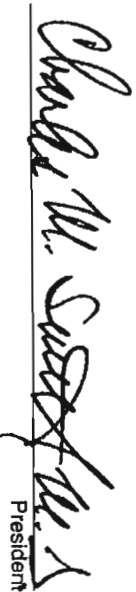
**STEPHANIE FORD**

In Recognition of

**FIFTEEN YEARS**

of Dedicated and Loyal Service

August, 2002

  
President



**CARING**

**EXCELLENCE**

**INTEGRITY**

**LEADERSHIP**

**PRIDE**

**TEAMWORK**

**CERTIFICATE OF APPRECIATION**



**MEDICAL CENTER  
OF DELAWARE**

Presented to

**STEPHANIE FORD**

In Recognition of

**TEN YEARS**

of Dedicated and Loyal Service

August, 1997

*Charles W. Smith, Jr.*  
President

48



CERTIFICATE OF SERVICE  
THE UNDERSIGNED HEREBY CERTIFIES  
THAT COPIES OF THE FOREGOING  
WERE CAUSED TO BE SERVED THIS  
9, MARCH 2007 UPON THE  
FOLLOWING IN THE MANNER INDICATED:

U.S. Certified Mail

MORGAN, LEWIS & BOCKIUS LLP  
/James H. McMackin.III  
1701 MARKET STREET  
PHILADELPHIA , PA 19103-2921,

David H. Williams  
Morris James LLP,  
500 Delaware Avenue, Suite 1500  
P.O. Box 2306  
Wilmington, Delaware 19899

A handwritten signature, likely of David H. Williams, is enclosed within a circular stamp or seal. The signature is written in dark ink and is somewhat stylized.